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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JAN 17 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)	
)	
Review of the Commission's Regulations)	MM Docket No. 94-150
Governing Attribution of Broadcast and)	
Cable/MDS Interests)	
)	
Review of the Commission's Regulations)	MM Docket No. 92-51
and Policies Affecting Investment in the)	
Broadcast Industry)	
)	
Reexamination of the Commission's)	MM Docket No. 87-154
Cross-Interest Policy)	
)	
Review of the Commission's Regulations)	MM Docket No. 91-221
Governing Television Broadcasting)	
)	
Television Satellite Stations Review of)	MM Docket No. 87-7
Policy and Rules)	
)	
Broadcast Television National Ownership)	MM Docket No. 96-222
Rules)	
)	
Review of the Commission's Regulations)	MM Docket No. 91-221
Governing Television Broadcasting)	
)	
Television Satellite Stations Review of)	MM Docket No. 87-8
Policy and Rules)	
)	

To: The Commission

**REQUEST FOR EXTENSION OF TIME TO SUBMIT COMMENTS AND
REPLY COMMENTS**

Media Access Project ("MAP"), on behalf of the Center for Media Education, the Minority Media and Telecommunications Council, the United Church of Christ, Office of Communication, the Institute for Public Representation and several other organizations representing listeners' and viewers' interests, respectfully requests that the Commission

extend the deadlines for submission of comments and reply comments responsive to the following notices in the above-captioned matters: *Further Notice of Proposed Rule Making*, MM Dockets No. 94-150, 92-51, 87-154 (released November 7, 1996); *Second Further Notice of Proposed Rule Making*, MM Dockets No. 91-221, 87-7 (released November 7, 1996; and *Notice of Proposed Rule Making*, Dockets No. 96-222, 91-221, 87-8 (released November 7, 1996). MAP asks that the deadline for comments and reply comments, be extended 30 days, through and including, respectively, March 7, 1997 and April 7, 1997. In the alternative, in the event that the Commission declines to grant an extension for the initial comments, MAP hereby requests that, based upon the same good cause described *infra*, the Commission at the least grant an extension of forty-five days (45) within which to file reply comments in the above-captioned proceedings. Should the Commission grant this extension, reply comments would be due on April 21, 1997.

MAP submits that there is good cause for grant of its request. An extension will serve the public interest and assist the Commission's decisional processes by insuring the development of a complete record.

First, as currently scheduled, the comments and reply comments for all of the above-captioned proceedings are due on the same dates. All of these rule making proceedings involve matters of great importance. The short comment and reply comment periods in these proceedings create an onerous workload for interested groups. It will be quite difficult, in the initial comments, to thoroughly address the numerous and complex issues raised in each of the three separate proceedings. The burden is especially great in preparation of reply comments: it will be nearly impossible to read and address the

numerous issues raised in the initial comments to all of these proceedings within the one (1) month allotted for reply comments.

Although members of the public have the most at stake in these proceedings, their counsel is more disadvantaged than counsel for industry interests because of the limited staff and resources they have available at any give time which they can devote to several complex and critically important proceedings.

In addition, there are a number of other unrelated proceedings currently before the Commission, also with similar comment deadlines, which are also critically important to the public's right to receive information. These include the *Personal Attack and Political Editorial Rule Proceeding*, Public Notice No. DA 96-2159 in General Docket No. 83-484 (released December 19, 1996), and the *Access Charge Reform Price Cap Performance Review for Local Exchange Carriers Proceeding*, CC Docket No. 96-262 (released December 24, 1996). MAP is participating in these proceedings on behalf of the public and, absent the requested extension, the need to prepare multiple responses to multiple proceedings will detract from its ability to prepare complete comments for each of the proceedings.

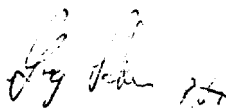
The requested extension periods will give the interested parties adequate time to prepare comments, to study the comments filed in the separate proceedings, and to thoroughly address the issues raised therein in reply comments. Since ownership diversity and attribution issues go to the heart of the public interest standard, the benefits of granting this request far outweigh the detriments.

In addition, the extension will assist in the creation of a much more complete record to be used by the Commission in these important proceedings. In the absence of an

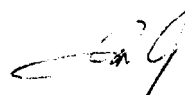
extension, full participation by all parties, most especially those members of the public which MAP represents, will be precluded.

WHEREFORE, MAP respectfully requests that the Commission grant an extension of one month, respectively, for comments and reply comments in the above-captioned proceedings with a new comment deadline of March 7, 1997 and a new reply comment deadline of April 7, 1997; alternatively MAP requests that the Commission at the least grant an extension of forty-five days within which to file reply comments in the above-captioned proceedings; and that it grant all such other relief as may be just and proper.

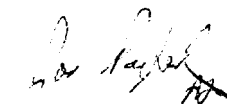
Respectfully submitted,



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